

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 1:13-md-2419-RWZ

This Document Relates to:
All Cases

**NOTICE OF FILING OF SECOND AMENDED
JOINT CHAPTER 11 PLAN OF NEW
ENGLAND COMPOUNDING PHARMACY, INC.**

Paul D. Moore, the Chapter 11 Trustee (the “Trustee”) for the chapter 11 estate of New England Compounding Pharmacy, Inc. (“NECC” or the “Debtor”), and the Official Committee of Unsecured Creditors of NECC (the “Official Committee,” and together with the Trustee, the “Plan Proponents”), hereby give notice of the filing of the *Second Amended Joint Chapter 11 Plan of New England Compounding Pharmacy, Inc.* (the “Plan”) filed in the United States Bankruptcy Court for the District of Massachusetts (the “Bankruptcy Court”) on May 12, 2015.

For the convenience of parties, a copy of the Plan is attached hereto as Exhibit A, and a blackline comparison copy of the Plan against the *First Amended Joint Chapter 11 Plan of New England Compounding Pharmacy, Inc.* [Chapter 11 Case Docket No. 1154] is attached hereto as Exhibit B. The Plan remains subject to further revision, and has not been approved or reviewed by the Bankruptcy Court.

[Signature Page Follows]

Dated: May 12, 2015
Boston, Massachusetts

Respectfully submitted,

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Certificate of Service

I, Michael R. Gottfried, hereby certify that on this day, May 12, 2015, I caused a copy of the foregoing document, which was filed using this Court's ECF system, to be served electronically upon those parties registered to receive ECF service.

/s/ Michael R. Gottfried
Michael R. Gottfried